

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UNITED STATES OF AMERICA  
v.  
LAJAEAL RUDLEY (02)

No. 3:20-MJ-548-BN

**MOTION FOR DETENTION**

The United States moves for pretrial detention of defendant, Lajael Rudley, pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility of Case. This case is eligible for a detention order because the case involves (check all that apply):

- Crime of violence (18 U.S.C. § 3156)
- Maximum sentence life imprisonment or death
- 10 + year drug offense
- Felony, with two prior convictions in above categories
- Serious risk defendant will flee
- Serious risk obstruction of justice
- Felony involving a minor victim
- Felony involving a firearm, destructive device, or any other dangerous weapon
- Felony involving a failure to register (18 U.S.C. § 2250)

2. Reason for Detention. The Court should detain defendant because there are no conditions of release which will reasonably assure (check one or both):

- Defendant's appearance as required  
 Safety of any other person and the community

3. Rebuttable Presumption. The United States will invoke the rebuttable presumption against defendant because (check one or both):

- Probable cause to believe defendant committed 10+ year drug offense or firearms offense, 18 U.S.C. § 924(c)  
 Probable cause to believe defendant committed a federal crime of terrorism, 18 U.S.C. § 2332b(g)(5)  
 Probable cause to believe defendant committed an offense involving a minor, 18 U.S.C. §§ 1201, 2251  
 Previous conviction for “eligible” offense committed while on bond

4. Time For Detention Hearing. The United States requests the Court conduct the detention hearing,

- At first appearance  
 After continuance of 3 days (not more than 3).

DATED this 5th day of June, 2020.

Respectfully submitted,

ERIN NEALY COX  
UNITED STATES ATTORNEY

/s/ Joseph A. Magliolo

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CERTIFICATE OF SERVICE

I hereby certify that on **June 5, 2020**, I hand-filed the foregoing document with the Clerk of Court for the United States District Court, Northern District of Texas, in open Court. I do not know the attorney who will represent the defendant; however, I hereby certify that I will hand-deliver a copy of the foregoing document to the attorney or the defendant at the first available opportunity to do so.

/s/ Joseph A. Magliolo

Joseph A. Magliolo  
Assistant United States Attorney